



*The miracles of science*

DuPont Burnside Plant  
3460 Highway 44  
Darrow, LA 70725-2404

June 1, 2012

Ms. Dorinda Folse  
U. S. Department of Labor  
Occupational Safety and Health Administration  
Region VI, Baton Rouge Area Office  
9100 Bluebonnet Centre, Suite 201  
Baton Rouge, LA 70809-2985

RE : Complaint Number 367927

Dear Ms. Folse:

The E. I. du Pont de Nemours and Company (DuPont) Burnside Plant received a notification of complaint regarding alleged safety and/or health hazards, via fax, on May 25, 2012 addressed to Tom Miller and Larry Howard at E.I. DuPont De Nemours Inc. at the Darrow, LA location. The specific nature of the alleged hazard was as follows: Employees are being exposed to Sulfur Dioxide and Sulfur Trioxide due to leaks from the plant. The measures taken to contain the leaks have been inadequate, 29 CFR 1910.1000

From 29 CFR 1910.1000, Air Contaminants:

An employee's exposure to any substance listed in Tables Z-1, Z-2, or Z-3 of this section shall be limited in accordance with the requirements of the following paragraphs of this section.

*1910.1000 (a) Table Z-1.*


Sulfur Dioxide (CAS 7446-09-5) — 5 ppm (8 hour Time Weighted Average)

Sulfuric Acid (CAS 7664-93-9) — 1 mg/m<sup>3</sup> (8 hour Time Weighted Average)

We immediately investigated the allegation and have determined that there have been no leaks that have occurred on site leading to employee exposure of sulfur dioxide or sulfur trioxide. DuPont is committed to operating the Burnside Plant in a manner to prevent leaks. Leak prevention is integral to the design and construction of the plant and steps to minimize emissions and prevent leaks are included in the plant's Operating Procedures and Standard Operating Conditions (SOCs)

The plant is staffed at all times by trained operators. The operators are responsible for monitoring the computer based operating system, performing routine checks of operating equipment, initiating a maintenance repair order, troubleshooting operating problems, starting up and shutting down the units, performing minor maintenance items, and handling emergency situations. Operators perform a visual walkthrough of the process twice per shift. If any unusual situations are detected during field rounds and audits, they are required to be promptly reported to supervision. This is done so appropriate corrective measures can be completed in a timely manner.

In addition to the safe operation of the plant, DuPont maintains a rigorous predictive and preventative maintenance program that includes the following elements:

EXHIBIT #	8
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- Equipment inspection to ensure all critical equipment is operating in a safe and reliable condition.
- Internal and External Inspections of pressure vessels, process tanks, and storage tanks to note indications of recent or potential failures.
- Ultrasonic thickness readings are taken on pressure vessels, piping and storage tanks to identify areas of metal loss and to assist in determining corrosion rates.
- Vibration Analysis is conducted on critical rotating equipment (i.e. pumps and motors) as predictive maintenance to identify any mechanical problems before a severe failure occurs.
- Routine inspections of chemical transfer hoses, pressure relief systems, vent systems and devices, critical interlock, alarm and combustion devices, monitoring devices and sensors, emergency alarm and communication equipment and expansion joints.

A personal protective equipment (PPE) program has been established at the Burnside plant to ensure adequate PPE. Because of the inhalation and skin absorption hazards associated with sulfur dioxide and sulfur trioxide, chemical protective clothing and/or respiratory protection is required when there is a potential for personal exposure. The Burnside safety procedure, SAF 106, is a summary of the PPE assessments (required PPE) for routine jobs and maintenance activities. Attached is a copy of SAF 106.

The Burnside site periodically performs personal industrial hygiene monitoring of site employees to ensure controls in place are adequate to prevent personal exposure to chemical hazards. The most recent assessment was performed the week of March 26, 2012 and all samples regarding sulfur dioxide and sulfur trioxide (sulfuric acid mist) were below the OSHA PEL. Attached is a summary of the 2012 sulfur dioxide and sulfuric acid mist monitoring results.

Employees receive annual injury and illness training and are encouraged to report all safety incidents immediately to their direct supervision. Formal incident investigations are conducted on all safety incidents with an associated injury or potential injury. We have had no employee reports of sulfur dioxide or sulfur trioxide exposure due to leaks.

A representative of the site's safety committee has been provided with a copy of this response and concurs with its contents. There is not union representation at the DuPont Burnside Plant.

The complaint was posted in a readily accessible location for review by all employees. This response letter is being submitted by fax to the Area Director at Fax Number: (225) 298-5457, along with the signed Certificate of Posting, as required before the due date of June 2, 2012. We are also submitting a copy of the documents by certified mail in the event a fax malfunction should occur. Please feel free to contact me at (225) 473-5981 or T. J. Ozburn at (225) 473-5607 should you have any questions or need any additional information.

Sincerely,

Thomas Miller  
DuPont Burnside Plant Manager

Cc: Mr. T. J. Ozburn, DuPont  
Mr. Larry Howard, DuPont

Enclosure